TERRY GLEN TUCKER, ESQUIRE ATTORNEY AT LAW 80 WEST BROAD STREET BRIDGETON, NEW JERSEY 08302 (856) 453-7440 Attorney for Defendant(s)

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**Debtor** 

: UNITED STATES

: BANKRUPTCY COURT : FOR THE DISTRICT OF NJ

:CIVIL ACTION

CASE NO. 19-17188/JNP

:NOTICE OF MOTION:

Returnable: April 6, '21@11:00 am

Patricia Morgan

Kevin Mc Donald Esq PNC Bank NA KLM Law Group PC PO Box 94982

216 Haddon Ave #406 Cleveland, OH 44101 Westmont, NJ 08101 ATTN: Denise Carlon

Isabel C Balboa, Trustee 535 Rte 38, #580 Cherry Hill, NJ 08002

Office of US Trustee One Newark Center, Suite 2100 Newark, NJ 07102

**TAKE NOTICE** that the undersigned will apply to the above named Court, at the Mitchell H. Cohn U.S Courthouse, 400 Cooper Street, Camden, New Jersey, on **April 6**, **2021** @ **11:00** am, or as soon as counsel may be heard if upon objection, for an **Order Reinstating the Stay as to PNC Bank** 

See Attached Affidavit and Proposed Order.

Oral argument is not requested.

A proposed form of Order is annexed hereto.

Dated: March 8,

2021

/s/ Terry Glen Tucker, Esquire